

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

HOWARD L. ROSS,

Plaintiff,

v.

Case No. 08-C-0230

BOARD OF REGENTS OF THE
UNIVERSITY OF WISCONSIN SYSTEM,
RICHARD J. TELFER, JAMES W. FREER,
INDRA MOHABIR, MARTHA D.
SAUNDERS,

Defendants.

SUPPLEMENTAL AFFIDAVIT OF NADIM SAHAR

STATE OF WISCONSIN)

) ss.

COUNTY OF DANE)

NADIM SAHAR, being first duly sworn, on oath deposes and states as follows:

1. I am one of the attorneys representing the defendants in the above-captioned action.

2. Attached hereto as Exhibit D are certified copies of Higher Learning Commission financial records related to Howard L. Ross, received by defendants' counsel on January 23, 2009.

3. Attached hereto as Exhibit E is a true and complete copy of the transcript of the deposition of James Freer, conducted on August 6, 2008.

4. Attached hereto as Exhibit F is a true and complete copy of the transcript of the deposition of Richard Telfer, conducted on October 16, 2008.

5. Attached hereto as Exhibit G is a true and complete copy of the transcript of the deposition of Mary A. Pinkerton, conducted on October 21, 2008.

6. Attached hereto as Exhibit H is a true and complete copy of the transcript of the deposition of Randy Marnocha, conducted on October 15, 2008.

7. Attached hereto as Exhibit I is a true and complete copy of the transcript of the deposition of Martha D. Saunders, conducted on August 25, 2008.

8. Attached hereto as Exhibit J is a true and complete copy of Exhibit 99 to the deposition of Randy Marnocha, conducted on October 15, 2008.

/s/ Nadim Sahar
Nadim Sahar

Subscribed and sworn to before me
this 25th day of March, 2009.

/s/ Sally A. Mueller
Notary Public, State of Wisconsin
My Commission expires: 1/15/2012